	Case 2:17-cv-00105-SAB ECF No. 103 file	ed 04/06/18	PageID.1157	Page 1 of 5	
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14	Group, Inc., CXO Media, Inc. and Steve Ragan				
15	UNITED STATES	DISTRICT	COURT		
16	EASTERN DISTRICT OF WASHINGTON				
17					
18	RIVER CITY MEDIA, LLC, a Wyoming	No. 2:17-c	v-105-SAB		
19	limited liability company, MARK FERRIS, an individual, MATT FERRIS,	PLAINTIF	FS' AND DEI	FENDANT CXO	
20	an individual, and AMBER PAUL, an	•		NOTICE OF CXO	
	individual,	•	NC.'S SUBMI AL JURISDICT	SSION TO FION AND JOINT	
21	Plaintiffs,			TO VACATE AS	
22	vs.		RDER COMPE	ELLING COVERY FROM	
23	<b>V</b> 5.	CXO MEL			
24	PLAINTIFFS' AND DEFENDANT CXO MEDIA, INC.'S JOINT NOTICE OF CXO MEDIA, INC.'S SUBMISSION TO PERSONAL JURISDICTION AND JOINT MOTION FOR COURT TO VACATE AS MOOT ITS ORDER COMPELLING JURISDICTIONAL DISCOVERY FROM CXO MEDIA, INC. PAGE 1				
1	1				

1 KROMTECH ALLIANCE CORPORATION, a German corporation, 2 CHRIS VICKERY, an individual, CXO MEDIA, INC., a Massachusetts 3 corporation, INTERNATIONAL DATA 4 GROUP, INC., a Massachusetts corporation, and STEVE RAGAN, an 5 individual, and DOES 1-50, 6

Without Oral Argument Hearing Date: May 7, 2018 Spokane, Washington

Defendants.

Plaintiffs and Defendant CXO Media, Inc. ("CXO") file this Joint Notice of CXO's Submission to Personal Jurisdiction and Joint Motion for Court to Vacate as Moot Its Order Compelling Jurisdictional Discovery from CXO as follows:

- In an effort to avoid further expense on briefing relating to personal 1. jurisdiction, as well as expenses associated with jurisdictional discovery, Plaintiffs and CXO have agreed, among other things, that CXO will withdraw its challenge to personal jurisdiction in exchange for Plaintiffs not seeking jurisdictional discovery from CXO or IDG and dropping IDG from the suit. Consequently, the jurisdictional discovery upon which Plaintiffs' motion to compel (ECF No. 84) was predicated is now moot. Plaintiffs and CXO therefore request that the Court vacate as moot its Order Granting Plaintiffs' Motion to Compel (ECF No. 98) since such jurisdictional discovery is no longer needed.
- 2. Plaintiffs and CXO request that the Court enter the attached proposed order effectuating the foregoing.

PLAINTIFFS' AND DEFENDANT CXO MEDIA, INC.'S JOINT NOTICE OF CXO MEDIA, INC.'S SUBMISSION TO PERSONAL JURISDICTION AND JOINT MOTION FOR COURT TO VACATE AS MOOT ITS ORDER COMPELLING JURISDICTIONAL DISCOVERY FROM CXO MEDIA, INC. PAGE 2

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Respectfully submitted this 6<sup>th</sup> day of April, 2018. 1 2 s/Kevin J. Curtis, WSBA No. 12085 WINSTON & CASHATT, LAWYERS 3 601 W. Riverside, Ste. 1900 4 Spokane, WA 99201 (509) 838-6131 5 Facsimile: (509) 838-1416 E-mail Address: kic@winstoncashatt.com 6 7 Charles L. Babcock IV (admitted pro hac vice) cbabcock@jw.com 8 Texas Bar No. 01479500 9 William J. Stowe (admitted pro hac vice) wstowe@iw.com 10 Texas Bar No. 24075124 11 JACKSON WALKER L.L.P. 1401 McKinney Street 12 **Suite 1900** Houston, Texas 77010 13 (713) 752-4360 (telephone) 14 (713) 308-4116 (facsimile) 15 Attorneys for Defendants International Data 16 Group, Inc., CXO Media, Inc. and Steve Ragan 17 - AND -18 s/Jason E. Bernstein, WSBA Bar No. 39362 19 NEWMAN DU WORS LLP jake@newmanlaw.com 20 Leeor Neta, admitted pro hac vice leeor@newmanlaw.com 21 2101 Fourth Avenue, Suite 1500 22 Seattle, WA 98121 23 PLAINTIFFS' AND DEFENDANT CXO MEDIA, 24 INC.'S JOINT NOTICE OF CXO MEDIA, INC.'S SUBMISSION TO PERSONAL JURISDICTION AND JOINT MOTION FOR COURT TO VACATE AS MOOT ITS ORDER COMPELLING JURISDICTIONAL DISCOVERY FROM CXO MEDIA, INC. PAGE 3

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(206) 274-2800 Attorneys for Plaintiffs RIVER CITY MEDIA, LLC MARK FERRIS **MATT FERRIS** AMBER PAUL PLAINTIFFS' AND DEFENDANT CXO MEDIA, INC.'S JOINT NOTICE OF CXO MEDIA, INC.'S SUBMISSION TO PERSONAL JURISDICTION AND JOINT MOTION FOR COURT TO VACATE AS MOOT ITS ORDER COMPELLING JURISDICTIONAL DISCOVERY FROM CXO MEDIA, INC. PAGE 4

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1	I hereby certify that on April 6, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing			
2				
3	to the following:			
4	Jason E. Bernstein - jake@newmanlaw.com			
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